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August 17, 2012

**Via ECF**

The Honorable Madeline Cox Arleo  
United States Magistrate Judge  
United States District Court for the  
District of New Jersey  
M.L. King, Jr. Federal Building and  
U.S. Courthouse, Room 2060  
50 Walnut Street  
Newark, NJ 07102

**Re: *Chaudhri v. OSRAM Sylvania, Inc., et al.*,  
Civ. Action No.: 11-5504 (SDW) (MCA)**

Dear Judge Arleo:

We, and Kirkland & Ellis LLP, represent Defendants OSRAM Sylvania, Inc. and OSRAM Sylvania Products, Inc. in the above matter. Enclosed please find Defendants' proposed Joint Discovery Plan in advance of our Rule 16 Conference that is scheduled for next Wednesday, August 22, 2012.

Please note that Plaintiff's counsel, Sidney Liebesman, refuses to join in the enclosed Plan because Defendants have cited to the Federal Rules of Civil Procedure (specifically Rule 11, stating that Defendants presume Plaintiff's counsel have complied with Rule 11) as part of Defendants' position in paragraph 5.

We look forward to meeting with Your Honor next week.

Respectfully submitted,

*s/ Stephen M. Orlofsky*

STEPHEN M. ORLOFSKY

SMO:jm  
Attachment  
cc: Counsel of Record (via ECF)

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